



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

February 17, 2015

Linda Coates-Markle
Field Manager
Bureau of Land Management
Wenatchee Field Office
915 Walla Walla Avenue
Wenatchee, Washington 98801-1521

Re: Comments on the Draft Supplemental EIS for Vantage to Pomona Heights Transmission Line Project (EPA Project Number: 10-002-BLM).

Dear Ms. Coates-Markle:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed **Vantage to Pomona Heights Transmission Line Project** in Grant, Benton, Kittitas, and Yakima Counties, Washington.

The DSEIS analyzes potential environmental impacts associated with a new alternative route for the project (i.e., the New Northern Route (NNR)), developed after completion of the draft EIS for the project. Development of the new route took into consideration the inputs received from the public in February 2013, as well as the electrical regulating authority's revised transmission line separation distance requirements. While the longest portion of the NNR would be on the U.S. Department of the Army Joint Base Lewis-McChord Yakima Training Center (JBLM YTC), the new route would still run from the existing Bonneville Power Administration substation in Vantage, Grant County to Pacific Power's Pomona Heights substation in Selah, Yakima County, and cross federal, state, and private lands. The NNR would be about 41 or 48 miles long (with the Manastash Ridge subroute) and include two design options (overhead and underground) and the Manastash Ridge subroute variations (p. 2-3). Project activities under the NNR would remain the same as described for other Alternatives in the DEIS, with the exception of underground design option that would require construction activities, such as open cut trenching and horizontal directional drilling.

For the impacts analysis, the Bureau of Land Management considered three alternatives: the NNR and its components, the Preferred Alternative from the previous DEIS (Alternative D), and a No Action Alternative (p. 2-1). The DSEIS does not identify a preferred alternative. Based on comments received on this DSEIS and the DEIS, BLM will select its new Preferred Alternative. At the conclusion of the NEPA process, BLM and the Cooperating Agencies will decide to approve, approve with conditions or modifications, or deny Pacific Power (the Applicant) a Right-Of-Way to construct, operate, and maintain the proposed project facilities.

In our comments on the draft EIS in February 2013, we expressed concerns about the proposed project due to potential impacts to water quality, land use and farmlands, vegetation and wildlife, and cultural resources. While we recognize the addition of a new alternative in this DSEIS, we retain concerns articulated in our previous letter and expect the final EIS for the project will include adequate measures to protect and conserve resources in the analysis area.

The EPA appreciates BLM's efforts to consider public comments, and add the NNR to the project alternative actions in this supplemental EIS. Overall, the NNR would be shorter in length and be associated with fewer impacts on most resources in the project area when compared to the DEIS Preferred Alternative (p. 2-79). In particular, we are pleased to see that the NNR would result in virtually no impacts to agricultural land uses, water resources, wetlands, or air quality; and would result in the least amount of wildlife habitat disturbance, access road construction, and disturbance to cultural resources. However, we do have some concerns about potential impacts that the NNR may have on sage-grouse, habitat, geology and soils. We also have concerns regarding the climate change effects analysis.

The DSEIS indicates that the majority of the proposed NNR would be located within Priority Areas for Sage-Grouse Conservation and, therefore, would result in the greatest sage-grouse habitat loss (115 acres) (p. 4-84). We recommend that BLM continue to coordinate with the U.S. Fish and Wildlife Service and National Marine Fisheries Service and/or Washington State Department of Fish and Wildlife, as appropriate to address this and other potential impacts to species and fisheries. The final EIS should include relevant information developed as a result of this coordination with these agencies, particularly outcomes of consultations with the Services and recommended measures to protect species.

The DSEIS indicates that electric transmission service could be at risk of disruption as a result of seismic activity or landslides, particularly under the underground design option due to the difficulty or inability to span discovered faults (14 under the NNR compared to 2 under the DEIS Preferred Alternative (p. 4-241)). The NNR route would cross more than 2 miles of high landslide areas and excavate large volumes of soil (up to 215,000 cubic yards of soil/bedrock). There would be open cut trenching activities in highly erosive soils in areas with low restoration potential (p. 3-230). Because of concerns about these geologic and soil impacts associated with the proposed NNR, we support BLM's plan to conduct a more comprehensive geotechnical investigation of the analysis area (p. 4-242). The final EIS should include results of the geotechnical investigation, information on how seismicity was evaluated, and how the project was modified to reduce risks.

Regarding climate change effects, the DSEIS states that impacts to global climate change associated with implementation of the proposed project cannot be determined because established mechanisms to accurately predict the effect of resource management-level decisions do not exist, and that because the proposed project would result in minimal long-term emissions of greenhouse gases (GHGs), the long term impacts would not be considered adverse (p. 4-214).

Consistent with the Council on Environmental Quality's recent "Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts" ^[1], we recommend that the Final EIS include an estimate of greenhouse gas (GHG) emissions associated with the proposal, and a discussion of practicable mitigation to reduce the emissions. We also recommend that BLM consider the approaches for climate impact assessment outlined in the revised draft guidance and include relevant information in the Final EIS.

Based on concerns discussed above and recommendations for additional information, we are assigning a rating of EC-2 (Environmental Concerns – Insufficient information) to this DSEIS. A copy of the rating system used in conducting our review is enclosed for your reference.

We appreciate the opportunity to review this DSEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at mbabaliye.theogene@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure:

1. EPA Rating System for Draft Environmental Impact Statements

^[1] <http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.